

### REMARKS

Applicant respectfully requests the examiner to reconsider the arguments and amendments of April 8, 2005, restated herein, because applicant believes that a significant portion of these arguments were not considered or fully addressed in accordance with MPEP § 707.07(f). “Where the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant’s argument and answer the substance of it.” MPEP § 707.07(f). Applicant respectfully requests examination with full consideration of applicant’s arguments and amendments.

Specifically, regarding claim 4, the applicant argued that the limitation “outboard-facing surfaces” cannot be held to include “outwardly-facing” surfaces within a moonpool disposed in the hull. However, the examiner failed to address this argument and summarily repeated the previous rejection of claim 4, equating “outboard” with “outwardly.”

The specification clearly indicates that outboard-facing surfaces are those surfaces facing away from the centerline or center or vertical axis of the hull and inboard-facing surfaces are those surfaces facing toward the centerline or vertical axis of the hull. *Id.* at figs. 1, 2, 6, 11, p. 2 ll. 13-14, p. 5 ll. 19-20, p. 6 ll. 5-7, p. 6 ll. 15-16, and p. 9 ll. 1-6. The specification uses the terms outboard and inboard in agreement with general dictionary terms. For example, “outboard” is defined as “being away from the center line of the hull of the ship,” and “inboard” is defined as “toward the center of a ship.” Houghton Mifflin Company, American Heritage Dictionary (2d coll. ed. 1985). In the case of vessel with a hull which is generally symmetrical about a single vertical axis and thus have a number of center lines, such as platform vessels described in the application, the hull center is correctly indicated by the vertical axis (which generally passes through the center of mass). Holding the terms outboard and inboard to indicate facing outward or inward of a hull independent of the center of the hull is simply inconsistent with the clear use of the terms in the specification. U.S.

10/788,771 at figs. 1, 2, 6, 11, p. 2 ll. 13-14, p. 5 ll. 19-20, p. 6 ll. 5-7, p. 6 ll. 15-16, and p. 9 ll. 1-6. Thus, “outboard: and “outwardly” are not equivalent terms. Peterson does not disclose laterally supporting risers or umbilicals at outboard-facing surfaces of the hull. Applicant respectfully requests the re-examination of claim 4 in view of these arguments and an answer to the substance thereof in accordance with MPEP § 707.07(f).

Because the application must be readdressed by the examiner to answer the above argument, applicant humbly asks the examiner to also consider the amendments herein.

First, with regard to apparatus claims 23-32 and 34, independent claim 23 is amended to incorporate the limitation of original claim 27 that the risers or umbilicals are laterally supported at outboard-facing surfaces of the hull. Dependent claims 27-29 are cancelled without prejudice. In view of the above argument that Peterson does not disclose laterally supporting risers or umbilicals at outboard-facing surfaces of the hull, claims 23-26, 30-32 and 34-35 as amended herein are believed to be novel and patentably distinct.

Second, with regard to apparatus claims 36-39 and 41-43, these claims are intended to cover the embodiment of Figure 13. These claims are amended herein to more clearly distinguish them from the moonpool structure disclosed in Peterson. Claims 38 and 43 are cancelled without prejudice. It is believed that these claims as amended herein are novel and patentably distinct.


Finally, in response to the applicant’s argument that Peterson only teaches suspension of the risers or umbilicals on a temporary basis and as such fails to anticipate the claims, the examiner holds that the limitation “enduringly” is a purely relative term which carries no patentably weight. Applicant has therefore amended independent method claims 1 and 16 to include terms which the applicant believes are not purely relative. Although the terms “non-temporarily” and “for use during everyday ordinary vessel operation” are included in the claim preambles, because the antecedent basis for “risers or umbilicals” is established in the

preambles, the preambles must be considered to be a claim limitations. "The fact that claim language, including terms of degree, may not be precise, does not automatically render the claim indefinite....Acceptability of the claim language depends on whether one of ordinary skill in the art would understand what is claimed, in light of the specification." MPEP § 2173.05(b). The specification clearly differentiates everyday platform operation with enduring support of the risers or umbilicals from temporary riser support. U.S. 10/788,771 at p. 9 ll. 19-20. Applicant submits that one of ordinary skill will understand what is claimed, in light of the specification – a method of suspending risers or umbilicals during the everyday ordinary use of the vessel as a production platform. Therefore, applicant believes method claims 1-14 and 16-21 are novel and patentably distinct.

In summary, claims 1-14, 16-21, 23-26, 30-32, 34-37, 39, and 41-42 are pending in the application. Applicant believes the application is in condition for allowance. Applicant humbly requests the full and complete examination of all claims and consideration of the amendments and arguments herein. Allowance of claims 1-14, 16-21, 23-26, 30-32, 34-37, 39, and 41-42 and passage to issue is requested.

Respectfully submitted,

Andrews & Kurth L.L.P.  
600 Travis, Suite 4200  
Houston, Texas 77002  
713/220-3813 (office)  
713/238-4285 (facsimile)  
Customer No. 23,444

  
Brett T. Cooke  
Reg. No. 55,836

Date: June 22, 2005